

## EXHIBIT “1”

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(MIAMI DIVISION)**

**JANE DOE,**

Plaintiff,

v.

**STEVEN K. BONNELL II,**

Defendant.

CASE NO: 1:25-cv-20757-JB/Torres

**UNSWORN STATEMENT UNDER PENALTY OF PERJURY OF  
PLAINTIFF JANE DOE PURSUANT TO 28 U.S.C. § 1746**

I, Jane Doe, declare as follows:

1. I am over 18 years of age, and competent to provide testimony under oath.
2. I have personal knowledge of the matters herein and, if called to testify at the trial of this matter, I could competently testify as to the facts contained in this affidavit.
3. The following are my responses and clarifications to the misstatements and false allegations made by Defendant in his declaration [ECF No. 42-1].
4. RESPONSE TO PARAGRAPH 5: He added me as a friend first. Then I sent him a direct message because I was surprised. He references and includes a private direct message that I sent to Dan Saltman (Destiny's business partner) that I had never sent videos of other people to Destiny, which is completely taken out of context by Defendant. This statement was not supposed to be public, and the full context is that Dan is claiming everyone was sharing pornographic materials of others in a nonconsensual manner. Attached hereto as **Exhibit A** is a true and correct copy of the entire conversation from which that part of Exhibit A to his declaration was taken.

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5. Destiny has distorted the context and content of the DMs in order to malign me. Destiny is well aware that the videos I sent him were not with multiple third parties, but only with my former boyfriend who had given me consent to share.

6. RESPONSE TO PARAGRAPH 6: The referenced Exhibit B is incomplete and thus misleading. He sent videos of him and Melina to me first. Also, I have never claimed that the videos were filmed without my consent so he could only have included this assertion and the exhibit for *malicious* reasons. The fact that he is including these private messages, not even under seal, has only compounded the pain and emotional distress that he has already caused me.

7. RESPONSE TO PARAGRAPH 7: This is extremely misleading and mostly false. Although I did not object to him showing the videos to Melina, I was very clear that they should not be shared with anyone else. I was also clear that I would only share them with my former boyfriend. This is also false because he knew I had not had, and did not have, “other sex partners,” but rather just my former boyfriend.

8. Moreover, on February 26th 2020, *prior* to meeting him, I explicitly told him: [“publicly I’m okay with people knowing we’re hanging out but if anyone asks questions about having sex or anything along those lines I rather deny and keep that private between us.”](#) We had multiple conversations about active consent and the importance of it. Attached hereto as **Exhibit B** is a true and correct copy of the correspondence on February 26, 2020, in which Defendant is notified of my desire for privacy. Additionally, on March 5th, 2024, when another content creator named Lav claimed Destiny and I had sexual relations, I asked Destiny if he told her, or anyone, about us being together. He denied it. [He deleted his side of the messages, but here is mine.](#) Attached hereto as **Exhibit C** is a true and correct copy

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showing my side of the conversation which occurred on March 5, 2023, where I again express concern for privacy.

9. Destiny has admitted it is “scummy” to send explicit material without explicit consent. On January 4, 2021, Destiny discusses online how it was scummy and wrong for him to send pornographic videos of his wife at the time (Melina) without getting explicit consent from her about each woman he sent them to.

<https://www.youtube.com/watch?v=UEyGjmSuS3g&t=837s>

10. RESPONSE TO PARAGRAPH 8: Defendant admits he sent the video of me to a random fan, Rose, but tries to make himself sound good because he allegedly never told her my name. I am identifiable simply by the fact that my face is in the video and that I have multiple identifiable moles. Attached hereto as **Exhibit D** is a true and correct copy of statements made online on November 29, 2024 after the video was published where I was identified not just by my face, but because of my moles.

9. RESPONSE TO PARAGRAPH 9: Defendant claims that his transmission of the video occurred on April 9, 2022. We have no way of confirming this without looking at the logs. Sending media via Discord is not the same thing as sending media through text message. When you send a media file through Discord (a photo, video, etc), the file you send automatically creates a media link that can be shared with anyone who has a Discord account.

10. This means that Rose could copy and paste the media link anywhere, and a person simply would have to click it to gain access to it. This is different from sending a video through text messages, where a person would have to download and then reupload if they want to continue sharing the files with others.

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11. This means that when destiny sent that video to rose, he essentially created a “live link” where anyone that has a discord account could access this url. This link had to be accessible by late 2023, when “the hacker,” solotinyleaks, gained access to the account. If this link was not accessible by late 2023, then there would be no way for the hacker to have gotten the video. In other words, media sent on discord should be treated like a google drive link, because it functions effectively the same way. Destiny knows this is how discord functions, and knows of this security breach, seeing that he routinely posts discord media/attachment links for his public chat to access.

12. RESPONSE TO PARAGRAPH 9 AND 10: Defendant falsely claims that he only shared my video once, when we now know it was at least two times. His claim that he will not share the video again also has no credibility and provides me with no assurance based on his history of reckless sharing without consent and then lying about it.

13. RESPONSE TO PARAGRAPH 11: False- I have never claimed that 15 potential witnesses told me they received the video of me. He self-servingly claims the video he offered to send Hannah Brooke was not the video of me but based on his other proven false statements he has no credibility. He explicitly tells Hannah he will send her material that was leaked – ie., my video. Indeed, when asked about these messages with Hannah in his community chat, and what he would do if Hannah had said yes, she wanted those videos, Destiny responds with “I'D PROBABLY JUST TELL HER TO GO TO KF [Kiwi Farms] LOL”. Attached hereto as **Exhibit E** is a true and correct of Defendant's statement on January 30, 2025.

14. RESPONSE TO PARAGRAPH 13: My face is clearly visible. I was in denial. People identified me within hours of the leaks.

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17. RESPONSE TO PARAGRAPH 15: This is FALSE. Bonnell knows I was desperately trying to get the video removed. Attached hereto as **Exhibit F** are true and correct copies of the correspondence on December 5, 2024, between the Defendant and myself detailing my efforts to have the video removed.

18. RESPONSE TO PARAGRAPH 19: First, my settlement demand should have remained confidential but apparently nothing is confidential or private for Destiny. That demand was made before the complaint was filed, and Destiny is well aware that my attorneys told his attorneys I would be more than willing to listen to a reasonable offer. Moreover, I made the initial demand because Destiny informed me that if I wanted a settlement, I would have to retract my substack and *apologize to him*. I was told that a settlement offer was contingent on me *helping rebuild Destiny's image*.

19. RESPONSE TO PARAGRAPHS 20 AND 21: Destiny's claims that he has preserved evidence are very suspect. In addition to discord logs being deleted, Destiny apparently deleted his google drive as well. Destiny repeatedly admits that he has a google drive where he puts pornographic material. And the individual who leaked the videos in the initial kiwifarm leaks, solotinyleaks, confirmed they were from Destiny's google drive that he shared with Rose. Attached hereto as **Exhibit G**, is a true and correct copy of solotinyleaks' post confirming this and confirming that it has since been deleted [by Destiny]. I have a right to verify that google drive link and ensure that none of my materials were uploaded there.

20. RESPONSE TO PARAGRAPHS 23 AND 24: I have never specified where people could find the leaked material online. Unlike Destiny who directly told over 1 million people what website to search for my leaked material, I never gave specifics on my substack.

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If a person read my substack and materials alone, they would not know kiwi farms was hosting the leaked content. Attached hereto as **Exhibit H** is a true and correct copy of a social media post by Defendant on February 9, 2025, in which he informs the internet that the video is still on kiwifarms.

21. Moreover, the most damage was done after the initial leaks were posted. In fact on November 30th after the initial posting in kiwifarms, the website crashed repeatedly as a result of the large number of viewers. Attached hereto as **Exhibit I** is a true and correct copy of a social media post by the kiwifarms account on November 30, 2024, specifically stating that the video of me has caused the website to crash. This was around two months prior to me announcing my lawsuit. There is no evidence indicating the website crashed after I posted my substack, nor anything of the sort.

27. When the initial leaks were posted, and *before* I went public, I started receiving hundreds of harassing and hateful messages. Sizeable content creators that had tens of thousands to hundreds of thousands of followers were making public remarks identifying me in the video. Attached hereto as **Exhibit J** are true and correct copies of social media messages/posts which I received within the week after the kiwifarm leaks occurred.

28. Finally, I was forced to go public because two videos of me which contained my private messages were defaming me, claiming that I took hush money and that I didn't care about other victims: <https://www.youtube.com/watch?v=qUzXZtj7wBM&t=1s>  
<https://www.youtube.com/watch?v=1rObatoFVrA&t=3s>

These videos were gaining tens of thousands of views. In order to protect my reputation, I had to publicly come out with the truth. I also had no choice but to start a fundraising campaign in order

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to finance this suit against the Defendant, who has substantial financial resources at his disposal, and I do not have those resources.

29. Although in Paragraph 22 Destiny claims to have suffered financial losses, I believe he has actively profited from this legal case because he uses it as content on his streaming platform on almost a daily basis.

30. Destiny also *knows* that leaking nudes or private sexual DMs is “[one of the biggest forms of weird backstabbing shit a person can do, one of the worst things a person can do.](#)” He also believes [there are “almost no secrets” in the streaming world,](#) that if you tell one person a secret, soon everyone knows it. Destiny [knew I wanted to keep our sexual interactions private.](#) Despite knowing this, despite knowing the harm it would cause, despite believing that telling one person a secret in the streaming world would mean that everyone would eventually know, he *still* chose to send my video to other people without my consent.

31. I believe that Destiny’s repeated behavior of nonconsensually distributing materials without the consent of multiple women, despite knowing about the importance of explicit consent and knowing the harm it can cause others, is inherently a malicious act in itself.

32. Since the events of November 29th 2024, I have been in a continuous state of grief, mourning the person I used to be. I no longer wake up in the mornings excited, thinking about how I could make the world a better place. My first thoughts every morning revolve around suicide and anxiety. I wonder what other unexpected news might be released, and whether it will reach my friends and family. I think about the thousands of people who saw me at some of the most vulnerable moments of my life without consent. *I think about how I didn’t even get a chance to say no.* I think about how this will impact me for the rest of my life.



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33. I do not want to live in a world where people like Destiny are able to harm others free of consequence.

34. I have seen how Destiny has used his community to harass and threaten others who have turned against him in this case. How he has directly threatened to harm others, and has urged his community to put the safety of other content creators at risk by encouraging the doxxing of certain individuals. He has posted this information in his online chat, with seemingly no remorse.

35. I also fear that Destiny wants to use his community to harm me. He continues to profit off my pain, revealing private and embarrassing sexual messages of my past to an audience of hundreds of thousands of people. He continues to speak openly about the case, and as recently as a few days ago, openly mocks me online. Attached hereto as **Exhibit K** is a true and correct copy of a social media post made by the Defendant on April 28, 2025 in which he is obviously mocking my prior post. I know he wishes harm upon me for speaking the truth.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and understanding, the foregoing is true and correct.

Executed in Miami, Florida, this 2nd day of May, 2025.

  
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Jane Doe